

David S. Kahn
Nevada Bar No. 007038
J. Scott Burris
Nevada Bar No. 010529
WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP
300 South Fourth Street, 11th Floor
Las Vegas, NV 89101=
(702) 727-1400; FAX (702) 727-1401
E-mail: David.Kahn@wilsonelser.com
J.Scott.Burris@wilsonelser.com

Stephen M. Gaffigan (*Pro Hac Vice*)
STEPHEN M. GAFFIGAN, P.A.
401 East Las Olas Blvd., Suite 130-453
Ft. Lauderdale, Florida 33301
Telephone: (954) 767-4819
Facsimile: (954) 767-4821
E-mail: stephen@smgpa.net

Attorneys for Plaintiff Tiffany (NJ), LLC

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

TIFFANY (NJ), LLC,)	Case 2:11-cv-00590-LDG-GWF
)	
Plaintiff,)	
)	PLAINTIFF'S REQUEST FOR STATUS
v.)	CONFERENCE
)	
925LY.COM, <i>et al.</i> ,)	
)	
Defendants.)	
)	

Plaintiff Tiffany (NJ), LLC ("Tiffany" or "Plaintiff"), by and through its undersigned counsel hereby respectfully requests a status conference be held in the above-captioned matter and, as good cause therefor, states as follows:

On November 29, 2011, Plaintiff filed its Third *Ex Parte* Application for Entry of Temporary Restraining Order and Preliminary Injunction ("Third Application for TRO" (D.E. 76)) which remains pending before the Court.

On December 20, 2011 (D.E. 77), Plaintiff filed a Motion for Entry of Clerk's Default with

respect to Defendants 1, 3, 4-7, 9-10, 13, 15-19, 21-22, 24, 26-28, 30-31, 33-34, 36-37, 40-42, 45-50, 52-54, 56-64, 66-71, 73-74, 76-80, 82-88, 90-92, 96-98, 100, 102, 106-108, 110, 116-120, 122-126, 128-130, 135-139, 142, 145-150, 153, 155-156, 158, 160-161, 163-164, 166-168, 170-173, 175, 178-181, 183-184, 188-189, 192-194, 196-197, 200, 202, 206, 209-214, 216-218, and 220-223.

As per the Court's request, on December 29, 2011 (D.E. 78) and January 13, 2012 (D.E. 86), respectively, Plaintiff filed briefs addressing service of process and personal jurisdiction.

Many of the websites which are the subject of Plaintiff's pending Third Application for TRO are still up and running and some are reaching potential expiration and transfer dates. The operational domains which are the subject of the Third Application for TRO are continuing to cause irreparable harm to Plaintiff with each passing day. Therefore, Plaintiff respectfully requests the Court hold a status conference to allow Plaintiff to address any ongoing concerns of the Court regarding service of process and personal jurisdiction.

WHEREFORE Plaintiff respectfully requests that the Court hold a status conference in this matter at the Court's earliest convenience.

DATED: April 10, 2012

Respectfully submitted,

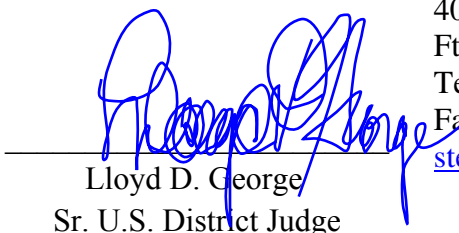
By: /s/ David S. Kahn
David S. Kahn
J. Scott Burris
WILSON, ELSE, MOSKOWITZ,
300 South Fourth Street, 11th Floor
Las Vegas, NV 89101
(702) 727-1400; FAX (702) 727-1401
David.Kahn@wilsonelser.com
J.Scott.Burris@wilsonelser.com

ORDER

IT IS SO ORDERED a status conference in the above matter is scheduled on Thursday April 19, 2012, at 9:00 AM in Crtrm. 6B.

Of Counsel:
Stephen M. Gaffigan (*Pro Hac Vice*)
STEPHEN M. GAFFIGAN, P.A.
401 East Las Olas Blvd., Suite 130-453
Ft. Lauderdale, Florida 33301
Telephone: (954) 767-4819
Facsimile: (954) 767-4821
stephen@smgpa.net

DATED this 10 day of April, 2012.


Lloyd D. George
Sr. U.S. District Judge